

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

WEINER LAW GROUP LLP  
STEFANI C SCHWARTZ, ESQ.  
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Parsippany, NJ 07054-0438  
Phone: (973) 403-1100  
Attorneys for Defendants

Richard M. Zelma,  
  
Plaintiff,

v.

PENN LLC d/b/a PULSETV.COM (an Illinois limited liability company) and PULSE DIRECT, INC. d/b/a PULSETV.COM (an Illinois corporation), and Jaffer Ali, as President of PULSE DIRECT, INC. and Does' (1010 and ABC Corporations' (1-10); each acting individually, in concert or as a group,

Defendants.

Civil Case No. 2:19-cv-08725-JMV-JAD

*Electronically Filed*

**DECLARATION OF  
STEFANI C SCHWARTZ, ESQ.  
IN FURTHER SUPPORT OF MOTION FOR  
SANCTIONS**

**STEFANI C SCHWARTZ, ESQ.**, being of full legal age, hereby certifies as to the following:

1. I am an attorney-at-law of the State of New Jersey and a Member of the law firm of Weiner Law Group, LLP, attorneys for Defendants, PENN LLC d/b/a PULSETV.COM, PULSE DIRECT, INC. d/b/a PULSETV.COM, and Jaffer Ali ("Defendants"), in this matter. I offer this Declaration in further support of Defendants' Motion For

Sanctions Pursuant To Fed. R. Civ. P. 11(C) And Pursuant To The Court's Inherent Power To Sanction.

2. A true and accurate copy of the case Harris v. World Fin. Network Nat'l Bank, 867 F. Supp. 2d 888 (E.D. Mich. 2012) is attached hereto as Exhibit A.

3. A true and accurate copy of the case Mfrs. Auto Leasing, Inc. v. Autoflex Leasing, Inc., 139 S.W.3d 342 (Tex. App. 2004) is attached hereto as Exhibit B.

4. A true and accurate copy of the case Kane v. Nat'l Action Fin. Servs., 2011 U.S. Dist. LEXIS 141480 (E.D. Mich. 2004) is attached hereto as Exhibit C.

5. A true and accurate copy of the case Alea London Ltd. v. Am. Home Servs., 638 F.3d 768, (11 Cir. 2011) is attached hereto as Exhibit D.

I hereby certify that the foregoing statements made by me are true. I am aware that if any statement is willfully false, then I am subject to punishment.

**Weiner Law Group, LLP**  
*Attorneys for Defendants*

By: /s/ Stefani C Schwartz  
STEFANI C SCHWARTZ

Dated: September 9, 2019